



## WEB PRIVACY POLICY

In compliance with the applicable data protection regulations, the users of the website [www.opdenenergy.com](http://www.opdenenergy.com) ("Website") are informed of the processing of their personal data by means of the following privacy policy ("Privacy Policy"). If you would like to know the companies that make up the Opdenenergy Group, please contact us via phone (+34)914559996 or via e-mail [privacy@opdenenergy.com](mailto:privacy@opdenenergy.com).

### **Who is responsible for the processing of your data?**

This Website is managed by OPDENENERGY HOLDING, S.A. with CIF A-31840135, parent company of the Opdenenergy Group.

Notwithstanding the foregoing, the party responsible for the processing of personal data provided by you through the Website is the company to which the interested party addresses, which is part of the Opdenenergy Group and has its registered office at Torre Spínola, Planta 5. Cardenal Marcelo Spínola, 42. 28016 Madrid, Spain (hereinafter "Opdenenergy").

Regarding the internal complaint-handling system implemented by Opdenenergy, the company to which the interested party addresses, and OPDENENERGY HOLDING, S.A., will act as co-responsible for the processing of personal data. These companies establish a co-responsibility agreement in compliance with Article 26 of the GDPR.

If you have any doubts about the Opdenenergy Group company you are contacting to, or you wish to know more about how the company processes your data, you can consult the list of companies, other subsidiaries and associated companies in the corporate reports and consolidated financial statements published by the Opdenenergy Group, through the following [link](#).

In any case, you can contact the person responsible for the processing of your data via telephone (+34)914559996 or via e-mail [privacy@opdenenergy.com](mailto:privacy@opdenenergy.com).

### **For what purpose are your data collected and based on what?**

Opdenenergy will process the personal data provided through the different forms on the Website for the following purposes:

- **CONTACT FORM:** The purpose is to be able to respond to the inquiries made by any interested parties, and if applicable, to send the requested information. The legitimate basis for this processing is the existence of a contractual or pre-contractual relationship.
- **'WORK WITH US' FORM:** The purpose is to receive and evaluate the job application, as well as the management of the internal database of candidates; and in case of having a vacancy that fits the profile, Opdenenergy will contact you. The legitimate basis for the inclusion of the candidate's data in the Opdenenergy employee database is the consent of the interested party or the application of pre-contractual measures. Consent may be withdrawn at any time via the following e-mail: [privacy@opdenenergy.com](mailto:privacy@opdenenergy.com)
- **INTERNAL INFORMATION SYSTEM (WHISTLEBLOWING CHANNEL):** the purpose is to attend to and investigate complaints received through the Internal Information System. The legitimate basis for this processing is the existence of a legal obligation, or where appropriate, the existence of a public interest.



## WEB PRIVACY POLICY GENERAL POLICY

You can consult the Internal Information System Policy for more information about the Whistleblower Channel operation, as well as the processing of your data, through the following [link](#).

Additionally, Opdenenergy will process the data of interested parties who contact through any means (e.g. email, telephone, corporate social networks, etc.) in order to answer the inquiries received and send the requested information through the email from which the inquiry is received.

No profiling or automated decisions are made with the data provided.

### **For how long is your data saved?**

Opdenenergy will keep your personal data in accordance with the purpose for which they were collected, and in no case they will be kept for longer than necessary.

In any case, the personal data you provide through the unsolicited application process will be kept in our databases for a period of one year.

The data provided through the Internal Information System will be kept in this system for the time necessary to carry out the investigations of the reported facts, and in any case, for a maximum period of 3 months in accordance with the applicable regulations.

However, Opdenenergy reserves the right to extract the information from the Internal Information System in order to continue the investigation of the reported facts. In these cases, the data will be processed for the time necessary to carry out the investigation and, if the facts are proven, the data will be retained as long as necessary for the Company to exercise its rights in court.

### **To whom is your data disclosed?**

The personal data provided may be communicated to other Opdenenergy Group companies for internal administrative purposes and for the investigation of complaints received.

On the other hand, Opdenenergy has service providers who act as data processors and help us to carry out our work.

Opdenenergy, in compliance with data protection regulations, has signed contracts with all its data processors to regulate the processing of personal data. Opdenenergy does not transfer data to service providers outside the European Economic Area ("EEA") or that do not offer an adequate level of security in terms of data protection.

In addition to the above, on certain occasions, it may happen that personal data collected in the Internal Information System must be transferred to one of the divisions or subsidiaries located outside the EEA. In these cases, Opdenenergy is legitimized by the fact that the transfer is necessary for reasons of public interest and for the formulation, exercise or defense of claims. In any case, Opdenenergy will take the necessary safeguards in compliance with data protection regulations.

Also, in the context of an internal complaint made through the Internal Information System, the data may be processed or communicated to the following parties when necessary:

- The service provider of the platform that manages the whistleblowing channel;
- The person in charge of the Internal Information System and designated bodies;
- Authorized representatives of Opdenenergy Group;
- External advisor who can assist in the assessment of the notification, investigation of the matter or to advise Opdenenergy Group in relation to the matter.

Finally, on certain occasions we may have to disclose your information to third parties, including courts, law enforcement agencies, prosecutors, consulting and legal firms.



### **What rights do you have and how can you exercise them?**

Users can exercise their rights of access, rectification, erasure (right to be forgotten), restriction of processing, data portability and object, via email to [privacy@opdenenergy.com](mailto:privacy@opdenenergy.com) or at the following address, Torre Spínola, Planta 5. Cardenal Marcelo Spínola, 42. 28016 Madrid (Spain).

The user may revoke the consents provided for any particular purpose at any time, without any aggravation to them.

In any case, the user can also submit a claim to the Spanish Data Protection Agency [www.aepd.es](http://www.aepd.es)

### **How do social networks work?**

Users can share the contents of Opdenenergy or publish their comments, photos or videos, through social networks providing that they are of interest to the entire community.

Opdenenergy social networks are constantly monitored in order to respond to enquiries received in the shortest possible time.

The publications of users of social networks at no time constitute or reflect Opdenenergy's point of view.

Opdenenergy social networks shall be governed by the following rules of use:

1. Users are responsible for the contents published, so they must refrain from violating any right, law or regulation.
2. Users must use at all times an adequate wording and tone and avoiding publishing any abusive, defamatory or obscene information.
3. Users must respect the right to privacy and refrain from making unlawful, offensive or discriminatory comments about third parties.
4. Users must avoid fraudulent, deceptive or misleading comments.
5. The use of any type of "spam" or commercial or advertising messages is not allowed; repetitive messages should be avoided too.
6. Conversations with profiles that may be regarded as false shall not be held.

Opdenenergy reserves the right to eliminate, hide or block those contents that do not comply with the established rules. Anyone who publishes content that is not allowed may be blocked out from the community.

Opdenenergy reserves the right to change these rules at any time and without prior notice.